

REMARKS

Counsel for the applicants appreciates the courtesy of the personal interview, which was conducted on May 11, 2010.

Claims 1, 11 and 14-21 are pending. The applicants respectfully request reconsideration and allowance of this application in view of the above amendments and the following remarks.

Claims 1, 11, 14, and 19-21 were rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 5,832,460, *Bednar et al.* ("Bednar") in view of U.S. Patent No. 5,920,847, *Kolling et al.* ("Kolling"). Claims 15, 17 and 18 were rejected under 35 USC 103(a) as being unpatentable over *Bednar* and *Kolling* in view of U.S. Patent No. 6,289,322, *Kitchen et al.* ("Kitchen"). Claim 16 was rejected under 35 USC 103(a) as being unpatentable over *Bednar*, *Kolling* and *Kitchen*, further in view of *Quicken vs. Money from SmartComputing* ("Quicken"). Independent claims 1 and 11 are amended as discussed below.

The applicants respectfully request that the rejections be withdrawn for reasons presented in the amendment filed January 12, 2010. Those arguments are expressly incorporated herein and are still applicable, but are not repeated to avoid confusing the issues. However, the examiner is requested to consider those reasons at this time.

The following are additional reasons for allowance of the currently amended claims over the references.

At the interview, unamended claims were discussed. By way of the above amendment the applicant has adopted the amendments discussed at the interview, namely:

- to replace previously canceled matter ("a supplier system used by a supplier who issues an invoice; a buyer system used by a buyer who receives the invoice");
- to more specifically define an "invoice" ("...an electronic invoice on which a unique identification code for identifying said electronic invoice from a plurality of electronic invoices issued by a same supplier is generated by said supplier system").

Kolling does not disclose including the invoice ID on the bill pay order 122. At the interview, it was agreed that Kolling's BRN (biller reference number used to identify the biller) is different from a unique identification code which is used to identify the invoice from other invoices issues by the same supplier. Also, counsel for applicant urged that the BRN performs a different function than the unique identification code that identifies the electronic invoice. In other word, the BRN performs a completely different function than the recited unique identification code on the electronic invoice of claim 1, to contrary of MPEP 2143. ("The rationale to support a conclusion that the claim would have been obvious is that all the claimed elements were known in the prior art and one skilled in the art could have combined the elements as claimed by known methods **with no change in their respective functions**, and the combination yielded nothing more than predictable results to one of ordinary skill in the art. *KSR*, 550 U.S. at ___, 82 USPQ2d at 1395.") Accordingly, it is respectfully submitted that amended independent claims 1 and 11 are patentable over the references.

Thus, Kolling does not use "only the unique identification code in the electronic deposit/withdrawal statement to specify and settle the electronic invoice" as recited in the independent claims.

In summary, the proposed combination of references fails to teach or suggest the combination of limitations in the claimed invention. It is submitted that claims 1 and 11 are patentable for similar reasons.

The combination of references fails to teach or suggest, for example, these elements recited in independent claims 1 and 11. It is respectfully submitted therefore that claims 1 and 11 are patentable over the combination of references.

With respect to the rejected dependent claims, applicant respectfully submits that these claims are allowable not only by virtue of their dependency from independent claims 1 or 11, but also because of additional features they recite in combination.

Applicants respectfully submit that, as described above, the cited references do not show or suggest the combination of features recited in the claims. Applicants do not concede that the cited references show any of the elements recited in the claims. However, applicants have provided specific examples of elements in the claims that are clearly not present in the cited references.

In view of the foregoing, the applicants submit that this application is in condition for allowance. A timely notice to that effect is respectfully requested. If questions arise, the examiner is invited to contact the undersigned by telephone.

If there are any problems with the payment of fees, please charge any underpayments and credit any overpayments to Deposit Account No. 50-1147.

Respectfully submitted,



Cynthia K. Nicholson

Reg. No. 36,880

Posz Law Group, PLC
12040 South Lakes Drive, Suite 101
Reston, VA 20191
Phone 703-707-9110
Fax 703-707-9112
Customer No. 23400